Briefing on New Soil and Groundwater Management Requirements

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TREASURE ISLAND
YERBA BUENA ISLAND
SAN FRANCISCO, CALIFORNIA

JUNE 30, 2017



Purpose/Outline

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Provide an overview of new soil and groundwater management requirements that may affect City agencies performing earthwork at Treasure Island and Yerba Buena Island

- Why is This Happening?
- Where/When Does this Apply?
- What is Required?
- A Look Ahead to Future Changes

Overview



- We will discuss new earthwork requirements for Treasure Island and Yerba Buena:
 - To comply with property transfer deeds
 - When disturbing soil or groundwater
 - o That apply within very limited areas and depths
 - That may not be "new" to you (mostly best practices)

Caveat:

 These don't replace your agency's standard procedures on the islands, your agency's best practices, local, state and Federal laws; status quo still applies outside the applicability of these new requirements

Why Is This Happening?

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- New earthwork requirements are driven by deed restrictions placed when parcels transferred from the Navy to TIDA
 - Certain areas transferred with environmental (not radiological) impacts left in place
 - Acceptable environmental condition for redevelopment
 - Precautions needed during earthwork
- Deeds/CRUP: "Restrict earthwork except in accordance with an SMP/SGMP"
 - Enforceable by DTSC
 - CRUP = Covenant to Restrict Use of Property

Why Is This Happening?

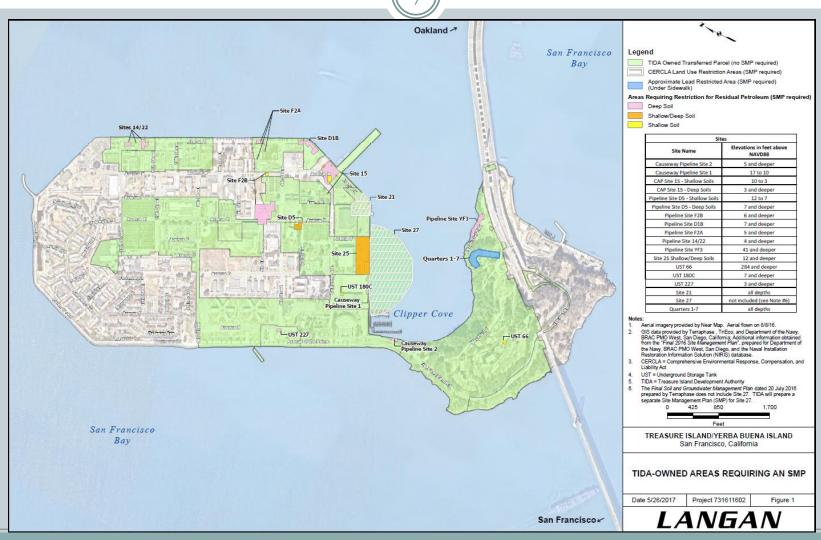
- TICD (developer) prepared an SGMP for their use to comply with deed/CRUPs (20 July 2016 document)
 - SGMP prepared by Terraphase
 - Geared toward their large scale earthwork project
- TIDA has adopted TICD's SGMP (7 June 2017 letter)
 - Exceptions to limit how it applies
 - Limited to certain areas on the island
 - Limited to certain depths
 - Exempted from many requirements that do not apply to smaller projects anticipated by TIDA and City Agencies

Where Does This Apply?



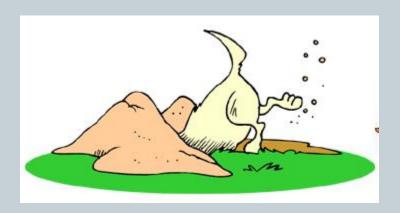
- Only to TIDA-owned portions of the island
 - No new requirements on Navy-owned portions
 - o SGMP to be updated as parcels are transferred
- Only to scattered parcels with environmental impacts left in place
 - Several petroleum areas closed in place
 - One VOC in soil gas areas (Site 21)
 - O Quarters 1-7 on Yerba Buena with lead in soils
- Petroleum areas further limited to certain depths
- Clipper Cove is covered separately

Where Does This Apply?



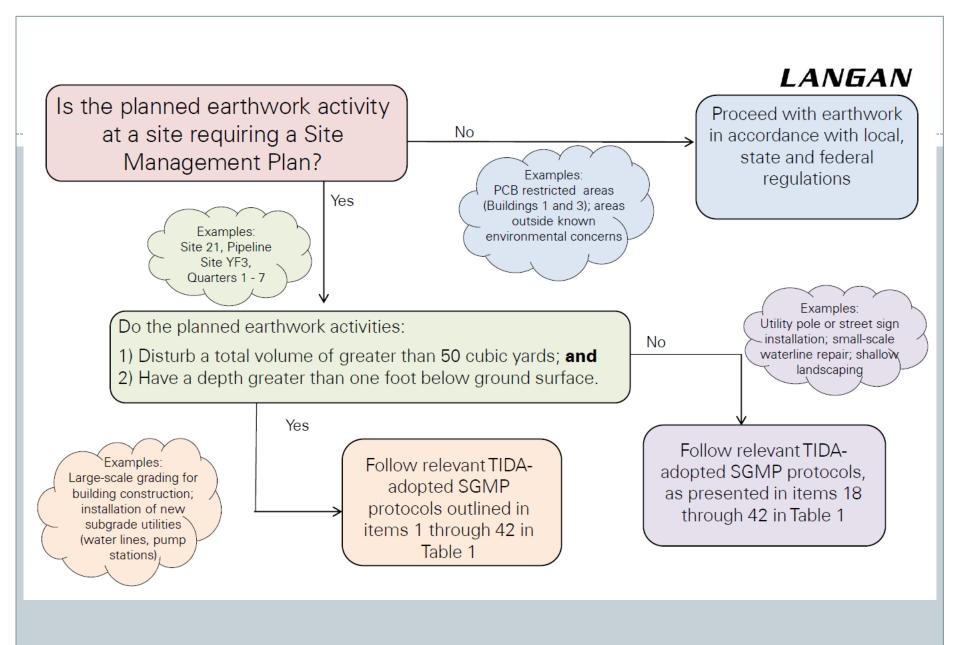
When Does This Apply?

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- Within the limited areas, requirements apply only when performing "soil disturbing activities" or "groundwater producing activities"
 - Excavation, trenching, grading
 - Construction dewatering, working below existing water table





- The SGMP requirements are fairly broad and extensive
 - Langan and TIDA worked with the DTSC to narrow the requirements to only those relevant to the scale and nature of earthwork project expected to be undertaken by TIDA and City Agencies
 - A table and a decision flowchart was created to help identify relevant/applicable procedures





- Within the limited areas, new requirements that apply to earthwork projects of any volume or depth:
 - Worker health and safety plan and procedures
 - Soil stockpile management
 - Proper waste management
 - Proper waste transportation and offsite disposal
 - Unknown conditions response
- Langan 7 June 2017 letter, Table 1, Lines 18-42



- Within the limited areas, additional new requirements that apply to earthwork projects greater than 50 CY and depth > 1 foot below surface:
 - Soil import fill criteria
 - Dust control
 - Stormwater management controls
 - Decontamination of equipment and vehicles
 - Oversight by an Environmental Professional
 - Transportation haul routes
 - Reporting to the DTSC
- Langan 7 June 2017 letter, Table 1, Lines 1-17





- Requirements in the SGMP that were exempted for TIDA and City agency projects:
 - Mostly EIR-related requirements
 - Cultural and paleontoligical (archaeological) monitoring
 - Biological monitoring
 - Noise controls
- Langan 7 June 2017 letter, Table 1, Lines 43-55

A Look Ahead to Future Changes



- Islands are in a period of transition as the Navy completes their environmental program and transfers properties to TIDA
 - Two transfers completed; six more anticipated
 - Each transfer will result in an updated SGMP by developer
 - Transfers will add additional parcels where SGMP requirements are required
 - TIDA will need to work with DTSC after each transfer to agree on changes to earthwork requirements
- Langan is available to help you understand and guide you through the new requirements

Questions?



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